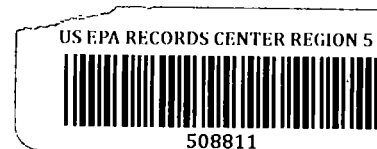


U.S. EPA REMOVAL ACTION
AT THE
FORMER STATLER HILTON HOTEL
DETROIT, WAYNE COUNTY, MICHIGAN
EMERGENCY CONTINGENCY PLAN
06 SEPTEMBER 2003



932087

The Former Statler Hilton Hotel (FSHH) site is located at 1539-1565 Washington Blvd. in Detroit, Wayne County, Michigan (Figure 1). The geographical coordinates for the site are 42°20'7.764" north latitude and 83°03'5.681" west longitude. The site is located in downtown Detroit, Michigan, in a mixed industrial/retail area. The site is located directly south of Grand Circus Park, and southwest of Comerica Park. The area is mostly vacant.

The site was a former hotel constructed in the early 1900's by hotel developer E.M. Statler. The hotel closed in 1975 and was turned over to the City of Detroit in 1979 for foreclosure after the owner (Detroit Hilton Limited Partnership) could not pay its back taxes. In 2000, MDEQ commenced asbestos abatement and debris removal from the site. Near completion of this cleanup phase, MDEQ discovered the presence of several transformers carcasses in the basement and the fourth floor in the site. MDEQ conducted PCB sampling of the areas around the transformer carcasses. MDEQ reviewed the PCB analytical data and then requested the assistance of the U.S. EPA to initiate and finish the site PCB cleanup activities.

In October 2002, EPA and its contractors conducted a site walk through and identified the transformer carcasses. Multimedia sampling was conducted. Solid samples were collected from the floor around the base of the transformers. A water sample was collected from the sub-basement and wipe samples were collected from the transformers. Analytical results show elevated PCB levels in all media.

On September 02, 2003, U.S. EPA initiated a removal action at the FSHH site to remove all the PCB transformers located on site. U.S. EPA command post will be established inside the building. Primary activities include removal of the transformers, removal of debris in basement area, cleaning and scrapping of basement floor, scarifying spill areas, wipe and concrete core sampling, and off-site disposal of wastes considered hazardous. Decontamination of process equipment will be performed as necessary. The following protocols provide necessary guidance for the following potential response events:

Vandalism/ Theft/ Trespass
Medical Emergencies
Fire/ Explosion

Vandalism/ Theft/ Trespass

Vandalism/ trespass is a threat during working and non-working hours. When the crew is not on-site, an armed guard is providing security. A fenced area adjacent to Bagley Street and a wood structure built across the front entrance off Washington Ave. provide daytime site security. In the event of vandalism/ theft of U.S EPA or contractor's property or interference by trespassers with daily work activities, the Detroit Police Department 1st Precinct will respond and coordinate with U.S. EPA On-Scene Coordinator Jeff Kimble.

Medical Emergencies

Rescue operations, if necessary in the exclusion zone, are to be conducted only if it is not possible for the injured person to be brought outside to EMS personnel. The exclusion zone is primarily limited to the basement and 4th floor of the building where spilled PCBs are located. If possible, response to medical emergencies will include decontaminating and removing injured personnel from the exclusion zone to the support zone. If possible, ERRS crew will decontaminate the victim prior to the arrival of ambulance service on-site, and the victim will be attended to at the support zone.

The victim should be decontaminated to the maximum extent possible, paying particular attention to the areas of the body or clothing that were in contact with site contaminants. If the injury is minor, a full decontamination should be completed and first aid administered prior to transport. If the victim's condition is serious, at a minimum, emergency decontamination should be completed using the eye wash station located in the support zone. For emergencies requiring transport to a hospital, gross decontamination will be handled by site crew. If further treatment is required, medical treatment and transport can be handled by EMS personnel.

Fire/ Explosion

In the event of a fire during working hours, the On-Scene Coordinator and Response Manager will be immediately notified, verbally or via radio, and, if the fire is small, will be extinguished using on-site fire extinguishers.

If a large fire occurs during working hours, personnel will immediately exit the exclusion zone through the nearest exit and meet at the designated area for a "head" count (Grand Circus Park). No one is to enter the exclusion zone for fire fighting purposes without personal protective equipment that meets, at a minimum, NFPA level "D" requirements. NFPA level "D" protection consists of a minimum of an SCBA and firefighter turnout gear. The Detroit Fire Department will be contacted to respond to all fires/ explosions at the site and will work in coordination with the U.S. EPA On-Scene

Coordinator for the specific locations of hazardous materials. The fire department will evacuate residents as necessary. Telephone numbers of personnel who should be contacted in the event of an incident are listed in the attached page.

At a minimum, the following personnel should be notified:

- U.S. EPA On-Scene Coordinator, Jeff Kimble
- Local Fire Department via 911
- Environmental Quality Management Response Manager, Bob Armstrong

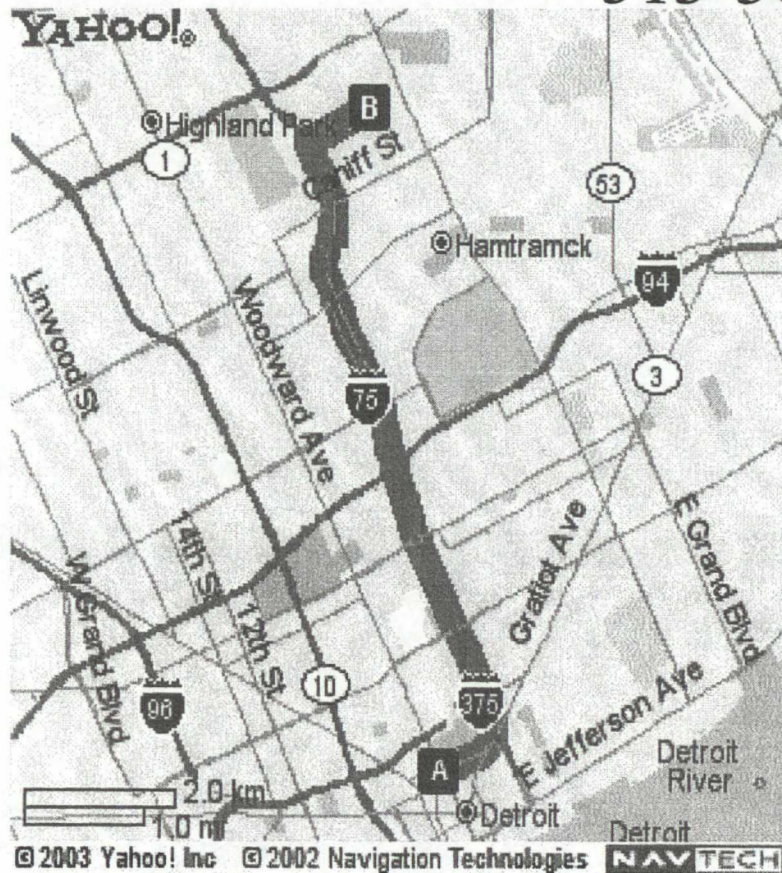
In the event of heavy smoke or toxic gas emission, an evacuation may be necessary and should proceed according to LEPC-EMA guidelines. U.S. EPA Superfund Technical Assessment and Response Team (START) will assist with air monitoring. START assistance will be coordinated through EPA.

**FORMER STATLER HILTON HOTEL SITE
DETROIT, WAYNE COUNTY, MICHIGAN**

LIST OF CONTACTS

Federal	Contact	Phone Number
U.S. EPA On-Scene Coordinator, Grosse Ile, Michigan	Jeff Kimble	(734) 692-7688 (office) (734) 740-9013 (cell) (734) 692-7677 (fax) (888) 719-1521 (pager)
National Response Center	Duty Officer	(800) 424-8802
U.S. EPA Contractors	Contact	Phone Number
Weston (START) Contractor	Lori Ash	(313) 989-2527 (office) Non-Responsive
Environmental Quality Management (ERRS) Contractor	Bob Armstrong	Non-Responsive
Local/State	Contact	Phone Number
Detroit Police Department 1 st Precinct		(313) 596-5101 or 911
Local Fire Department	Duty Chief	911
Greater Detroit Hospital	N/A	(313) 369-3000

Greater Detroit Hospital
3105 Carpenter Ave
Detroit MI
313-369-3000



- Start on **PARK AVE** (at **WASHINGTON BLVD & PARK AVE** in **DETROIT**) going towards **WASHINGTON BLVD** - go **< 0.1 mi**
- 2. Continue on **WITHERELL ST** - go **0.1 mi**
- 3. Turn on **MADISON ST** - go **0.4 mi**
- 4. Take **I-75 NORTH** towards **NORTH FISHER FWY** - go **3.3 mi**
- 5. Take the **CANIFF AVE/HOLBROOK AVE** exit, exit **#55** - go **0.2 mi**
- 6. Continue on **CHRYSLER DR** - go **0.6 mi**
- 7. Continue on **NAGEL ST** - go **0.7 mi**
- 8. Turn on **CARPENTER ST** - go **0.6 mi**
- 9. Arrive at **3105 CARPENTER ST, DETROIT**

8 pages redacted
Non-responsive